



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

December 28, 1993



REPLY TO THE ATTENTION OF:
HSRL-6J

Illinois Department of Public Health
535 West Jefferson Street
Room 500
Springfield, Illinois 62761

Re: Public Health Assessment (Public Comment Release), Pagel's
Pit Landfill, New Milford, Winnebago County, Illinois,
CERCLIS No. ILD980606685

Gentlemen:

I am the remedial project manager assigned by the U.S. Environmental Protection Agency to the Pagel's Pit site. I am submitting the enclosed comments on the public comment release of the Public Health Assessment that was issued for comment shortly before or on December 1, 1993.

Thank you for this opportunity to comment. If you have any questions, please feel free to call me at 312-886-4746.

Sincerely yours,


Bernard J. Schorle
Remedial Project Manager

Enclosure



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A handwritten signature in cursive script that reads "Bernard J. Schorle".

Bernard J. Schorle
Remedial Project Manager

Enclosure

bcc: John Holmstrom III, Winnebago Reclamation Service, Inc.
Fred W. Nika, Jr., Illinois Environmental Protection Agency
Louise Fabinski, Agency for Toxic Substances and Disease
Registry

**Comments on
Public Health Assessment
Pagel's Pit Landfill
Public Comment Release**

1. Page 10. I disagree with the description of *maximum contaminant level* (MCL). I do not believe that you can state that "these standards are well below levels for which health effects have been observed". An example is arsenic. Risk calculations indicate that the MCL for arsenic should be considerably below what it currently is. Also, why are there maximum contaminant level goals that differ from the MCLs if the above quote is true. I believe you should consult the definition for MCL in 40 CFR Part 141.

2. Page 10. While a large number of groundwater monitoring wells and one private well were sampled during Phase I, not all area wells were sampled, not even all area groundwater monitoring wells.

3. On page 5 it is stated, "Generally, the aromatic hydrocarbons were detected more frequently and at higher levels than the chlorinated ethylenes and ethanes." On page 11 it is stated, "Chlorinated hydrocarbons are the main contaminants of concern in groundwater around this site (Tables 2 and 3)." I believe that these two statements are going to confuse a lot of people. Therefore, an explanation is necessary. See Section V of the Record of Decision (ROD) Summary (June 28, 1991). It appears that the quote from page 5 should state that this applies to the leachate. This is not clear from the text (the previous sentence mentions both leachate and groundwater samples), and since the leachate is generally of not much concern as long as it is managed, which is the case here (and it is easier to manage the leachate where there is a liner and a leachate extraction system than the groundwater), most would not assume that this applies to the leachate.

4. Page 11. I assume that well G109A is the well that you are calling upgradient and that contained 62 mg/l. Grouping this well, and others near it, with other truly upgradient wells is dangerous in this case. This well is essentially side-gradient as far as its physical location is concerned. In this fractured bedrock, where gradients over short distances may not be in the same direction as those over larger distances, it may not be correct to characterize this well as being upgradient. Another complication, which has neither been demonstrated nor disproved, is that there may be some mounding around the landfill. (There is another possible explanation for the somewhat elevated chloride concentrations in well G109A and others nearby. In late 1984 and early 1985, the chloride concentration in this well was around 30 mg/l. Since that time, some residential water treatment units were installed and it is my understanding that these include a water softener. One of the residences is east of well

G109A. It is possible that chloride from the regeneration of the softener, which is probably being discharged into the septic tank, has increased the chloride concentration at well G109A.) You will note that wells that are truly upgradient and some distance away from the landfill do not have chloride concentrations that approach what was in this well at the time of the remedial investigation. I do not believe that an impression should be given that naturally occurring background levels of chloride may be as high as 62 mg/l.

5. Page 11. You have failed to bring in the elevated chloride concentrations found at well G115, which is along the southern border of the landfill and west of the center of the landfill. I do not believe anyone has suggested that the loading of leachate into trucks has been the source of the chlorides here.

6. Page 13, Section D. There is obviously no building storing gas. In fact, there is no storage of gas once it is removed from the landfill.

7. Page 15 (see also page 19). As of the time of the ROD, there were 91 gas extraction wells (see page 3 of the ROD).

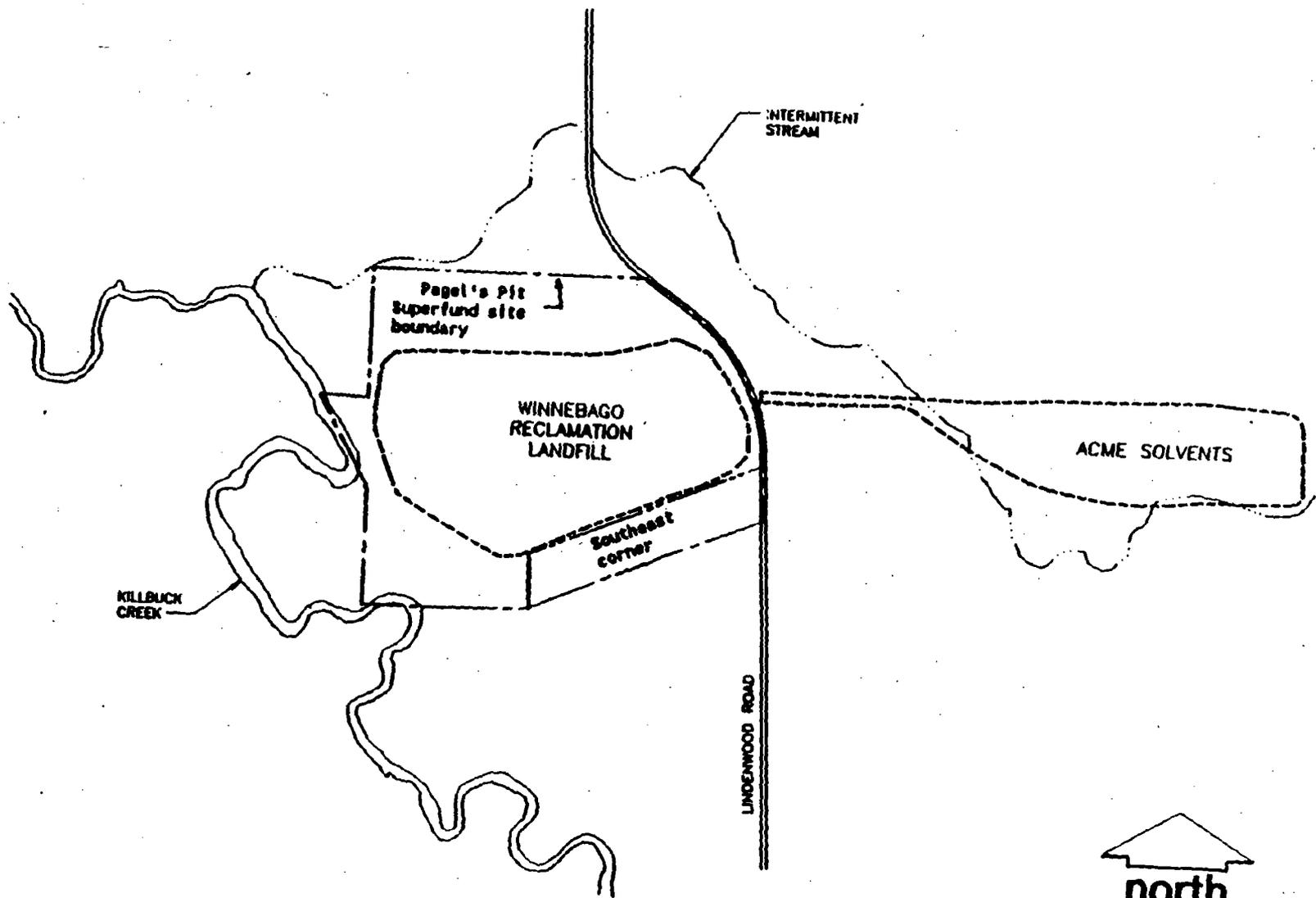
8. Page 15. USEPA is not intending to install a groundwater extraction system at the site. Such a system is part of the remedy selected and presented in the ROD. It is USEPA's intention to have the potentially responsible parties for the site install such a system. Following negotiations, a Consent Decree has been entered that does include a requirement for the installation of this extraction system. USEPA would only install such a system if the parties did not do so and it was still determined to be necessary.

9. It is my understanding that presently the leachate is being sent to the wastewater treatment plant through a pipeline that discharges into the sewer rather than still being transported by truck. This pipeline was installed after the ROD was signed.

I noticed a few typographical errors that I have not noted here.

Attached is a copy of the "Map of the Site" which is Appendix C of the Consent Decree entered February 11, 1993. In the definitions section of the Consent Decree, "Site" is defined as "the Pagel's Pit Landfill Superfund site, encompassing approximately 90 acres, located on Lindenwood Road, south of Baxter Road (also known as the Winnebago Reclamation Landfill) in Winnebago County, Illinois and depicted generally on the map attached as Appendix C."

 Bernard J. Schorle
December 28, 1993



Appendix C
Map of the Site

